

2017 Medicaid Provider Rate Review Analysis Report

HCBS Waivers

Appendix C – The Rate Review Process and Consumer Directed Attendant Supports (CDASS)

Appendix C provides more information regarding why CDASS received a modified analysis in the rate review process. This appendix also includes a rate-to-rate comparison for consumer-directed services to other state Medicaid agencies. This appendix is an updated version of [the Rate Review Process and Consumer Directed Attendant Supports handout](#), distributed during the March 17, 2017 MPRRAC meeting.



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Department of Health Care
Policy & Financing

The Rate Review Process and Consumer Directed Attendant Support Services

Updated May 1, 2017

Because Consumer Directed Attendant Support Services (CDASS) is a service delivery model, the Department plans to conduct a modified rate review analysis. This document explains why the Department must use a modified analysis. For more information about the rate review process, see the [Frequently Asked Questions document](#) on the Department's [Medicaid Provider Rate Review Advisory Committee \(MPRRAC\) website](#).

CDASS is a delivery model that allows client flexibility in using certain HCBS Waiver services: personal care, homemaker, and health maintenance services. Through CDASS, clients have the flexibility to:

- Hire attendants;
- Determine attendant wages;
- Determine attendant schedules; and
- Coordinate the amount of personal care, homemaker, and health maintenance services to best meet their individual needs.

In some situations, clients on qualifying HCBS Waivers may instead access personal care, homemaker, and health maintenance services through an agency. In FY 2015-16 the Joint Budget Committee (JBC) appropriated additional funding for agency-based homemaker and personal care services, but did not appropriate additional funding for the same CDASS services. The payment methodology and available data for these services differs based on whether services are accessed through an agency or CDASS. Differences are illustrated in the example below.

Example: A client's service plan indicates a client needs 10 units of homemaker services and 20 units of personal care services.

Agency: After approval of the client's prior authorization request (PAR), an agency would arrange for attendants to provide services for the client. The agency would then submit a claim to the Department for the services that were provided. The Department would have access to the following information:

Service	Authorized Units	Utilized Units	Unit Rate	Payment to Agency
Homemaker	10	10	\$4.25/15 min	10 x \$4.25 = \$42.50
Personal Care	20	20	\$4.25/15 min	20 x \$4.25 = \$85.00
TOTAL	30	30		\$127.50



If the client’s needs were to change and, for example, the client now needed 5 units of homemaker services and 25 units of personal care services, the client would work with their case manager to submit an updated PAR. The client would not be able to utilize additional units or modify services received until the PAR had been revised.

CDASS: After approval of the client’s PAR, a set dollar amount would be allocated to the client, based on the need for 10 units of homemaker services and 20 units of personal care services. The client could then contact an attendant and schedule services and might choose to modify the amount of homemaker and personal care they receive.

Service	Authorized Units	Utilized Units	Unit Rate	Payment to Attendant
Homemaker	10	5	\$3.86/15 min	5 x \$3.86 = \$19.30
Personal Care	20	25	\$3.86/15 min	25 x \$3.86 = \$96.50
TOTAL	30	30		\$115.80 (Total Allocation to Client)

If the client’s needs were to change and, for example, the client now needed 25 units of personal care services, the client would have the flexibility to schedule attendants for additional hours of personal care and reduce their use of homemaker services to 5 units. CDASS clients can substitute services to respond to changing needs in so far as their allocation amount is not exceeded. Because clients have this flexibility, and are not required to follow the service type authorized to determine their allocation for services, the Department lacks access to utilized units by service. Instead, the Department has access to the overall total payment to all attendants. Additionally, if the client chooses to pay the attendant a higher wage than the unit rate used in the allocation formula, the client could receive fewer hours of service, and the Department would not have access to this information.

Without utilization and service-specific provider payment information, the Department cannot conduct the normal rate comparison and access analysis. Instead, the Department researched other state Medicaid rates for services similar to services available through the CDASS delivery model. Research results are summarized in the table on the following pages. The table includes service titles, HCBS Waiver names, the state, the rate, and the unit. Please note, CDASS service names in other states’ HCBS Waivers vary from state to state. Additionally, specific services offered through consumer-direction delivery models may vary from state to state, with some states offering more or fewer services. All figures in the table are pulled from 1915(c) Waiver Applications – Appendix J.



CDASS Cost per Unit – Rate-to-Rate Comparison				
Service Title	Waiver	State	Rate	Unit
Consumer Directed Attendant Support Services, Homemaker	EBD, CMHS, BI, SCI	CO	\$3.86	1/4 Hour
Consumer Directed Attendant Support Services, Personal Care	EBD, CMHS, BI, SCI	CO	\$3.86	1/4 Hour
Consumer Directed Attendant Support Services, Health Maintenance	EBD, CMHS, BI, SCI	CO	\$7.27	1/4 Hour
Self Directed Personal Care	HCBS for Persons with ID	AL	\$3.48	1/4 Hour
Self Directed Personal Care	HCBS Living at Home Waiver for Persons with ID	AL	\$3.48	1/4 Hour
Personal Support Direct Hire	Individual & Family Support	CT	\$3.91	1/4 Hour
Participant Directed Personal Care Services	Elderly and Persons with Disabilities	DC	\$4.08	1/4 Hour
Consumer Directed Personal Support Services	Elderly and Disabled Waiver	GA	\$1.00	Unit
Individual Provider Personal Assistant-Non Agency	Persons with Disabilities	IL	\$13.98	Hour
Consumer Directed Attendant Care-Unskilled, Individual	HCBS Waiver for Persons with Physical Disabilities	IA	\$4.91	1/4 Hour
Consumer Directed Attendant Care-Unskilled, Individual	HCBS Health and Disability Waiver	IA	\$3.42	1/4 Hour
Consumer Directed Attendant Care-Unskilled, Individual	HCBS Elderly	IA	\$3.53	1/4 Hour
Self Directed Personal Care	HCBS Intellectual Disabilities Waiver	IA	\$750.28	Month
Consumer Directed Attendant Care-Unskilled, Individual	HCBS AIDS	IA	\$3.13	1/4 Hour
Personal Service Attendant, Self-Directed	Technology Assisted Waiver	KS	\$3.32	1/4 Hour
Personal Services, Self-Directed	TBI Waiver	KS	\$3.24	1/4 Hour



CDASS Cost per Unit – Rate-to-Rate Comparison						
Service Title	Waiver	State	Rate	Unit		
Personal Services, Self-Directed	Physical Disability Waiver	KS	\$2.81	1/4 Hour		
Personal Care Services, Self-Directed	HCBS for the Frail Elderly	KS	\$2.68	1/4 Hour		
Consumer Directed Personal Assistance Service	Community Choices Waiver	LA	\$2.83	1/4 Hour		
Self Directed Personal Care	Elderly and Adults with Disabilities	ME	\$3.20	1/4 Hour		
Personal Supports Retainer Fees Self Direction	Community Pathways Waiver	MD	\$30.00	Item		
Consumer Directed Community Supports: Personal Assistance (Also can be used for Homemaker services)	Elderly Waiver	MN	\$202.82	Decremental		
Consumer Directed Community Supports: Personal Assistance	Brain Injury Waiver	MN	\$116.80	Decremental		
Consumer Directed Community Supports: Personal Assistance	Community Alternative Care Waiver	MN	\$430.37	Decremental		
Consumer Directed Community Supports: Personal Assistance	Community Alternatives for Disabled Individuals	MN	\$134.74	Decremental		
Consumer Directed Community Supports: Personal Assistance	DD Waiver	MN	\$56.55	Decremental		
Personal Assistant, Individual Consumer Directed	Autism Waiver	MO	\$4.09	1/4 Hour		
Personal Assistant, Self Directed Individual	Partnership for Hope Waiver	MO	\$3.35	1/4 Hour		
Non-Agency Attendant Care	HCBS for Persons with Physical Disabilities	NV	\$4.42	1/4 Hour		
Self-Directed Personal Care	Medically Fragile Waiver	OK	\$3.69	1/4 Hour		
Self-Directed Personal Care	My Life My Choice Waiver	OK	\$4.37	1/4 Hour		
Member-Directed Personal Care	Sooner Services Waiver	OK	\$3.69	1/4 Hour		



CDASS Cost per Unit – Rate-to-Rate Comparison				
Service Title	Waiver	State	Rate	Unit
Personal Assistance Services Participant Directed	Attendant Care Waiver	PA	\$3.49	1/4 Hour
Personal Assistance Services Participant Directed	HCBW for Individuals Aged 60 and Over	PA	\$3.49	1/4 Hour
Personal Assistance Services Participant Directed	OBRA Waiver	PA	\$3.18	1/4 Hour
Personal Assistance Services-Self Directed	Community Based Alternatives Waiver	TX	\$11.73	Hour
Personal Attendant Services, Participant Employed	Waiver for Individuals Age 65 or Older	UT	\$3.11	1/4 Hour
Consumer Directed Personal Assistance Services	Intellectual Disabilities Waiver	VA	\$9.50	Hour
Consumer Directed Personal Care	Family and Individual Support Waiver	VA	\$9.50	Hour

